



**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

***Surface Water Quality Bureau***

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RON CURRY  
Secretary  
SARAH COTTRELL  
Deputy Secretary

CERTIFIED MAIL – Return Receipt Requested

August 13, 2010

Mr. John Arrowsmith, Utilities Director  
Los Alamos County  
Post Office Box 1030  
Los Alamos, NM 87544

RE: Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, Los Alamos County,  
White Rock Wastewater Treatment Plant, NPDES Permit No. NM0020133 July 15, 2010

Dear Mr. Arrowsmith:

Enclosed, please find a copy of the report for the above referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environment Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, TX for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during the inspection are discussed in the Further Explanation section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and modify your operational and/or administrative procedures, as appropriate.

I wish to thank you for the cooperation that was extended by you and facility staff, Mr. Ayers, Mr. Martinez and Mr. Lucero. If you have questions please feel free to contact me at the above address or by telephone at (505) 827-0212.

Sincerely,  
/S/

Barbara Cooney  
Environmental Scientist – Specialist

Cc: Marcia Gail Bohling (6EN-AS), EPA, Dallas, TX via email  
Samuel Tates (6EN-AS), EPA, Dallas, TX via email  
Carol Peters-Wagnon (6EN-WM), EPA, Dallas, TX via email  
Diana McDonald (6EN-WM), EPA, Dallas, TX via email  
Larry Giglio (6WQ-P), Permits Branch, EPA, Dallas, TX , via email  
NMED District I, via email



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3 N M 0 0 2 0 1 3 3 11 12 1 0 0 7 1 5 17 18 c 19 S 20 1					
Remarks					
L O S A L A M O S C N T Y W H I T E R O C K W W T P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 1 69	70 3	71 N 72 N 73 74 75 M I N O R 80			

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Los Alamos County White Rock WWTP – From Santa Fe -> Take Hwy 285 N to the Los Alamos exit on State Hwy 12.5 miles -> NM 502 W go 11.9 miles -> take State Road 4 to White Rock -> Turn Left of Rover Blvd -> Turn Left on Meadow Lane -> Turn Left on Overlook Road, WWTP is on the left.	Entry Time /Date 11:30 a.m. / July 15, 2010	Permit Effective Date 03/01/2006
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Jeff Ayers, Water –Wastewater Treatment Plant Superintendent 505-662-8269 Mr. Santiago Martinez – Operation Supervisor Mr. Paul Lucero – Plant Operator	Exit Time/Date 14:30 p.m. / July 15, 2010	Permit Expiration Date 02/28/2011
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. John Arrowsmith, Utility Director 505-662-8148 Department of Public Utilities P.O. Drawer 1030 Los Alamos, NM 87544	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Other Facility Data Minor Municipal SIC 4952 Latitude – 35° 49' 39.936" Longitude – -106° 11' 5.964"

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See Further Explanations For Details.

Name(s) and Signature(s) of Inspector(s) Barbara Cooney /S/	Agency/Office/Telephone/Fax NMED/SWQB	Date 13 August 2010
Signature of Management QA Reviewer Richard Powell /S/	Agency/Office/Phone and Fax Numbers	Date 13 August 2010

Los Alamos County, White Rock WWTP	PERMIT NO. NM0020133
SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>No</u> )
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. ALL DISCHARGES ARE PERMITTED	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>No</u> )
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
c) ANALYTICAL METHODS AND TECHNIQUES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
e) DATES AND TIMES OF ANALYSES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS:	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>Yes</u> )
1. TREATMENT UNITS PROPERLY OPERATED.	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA

Los Alamos County White Rock	PERMIT NO. NM0020133
<b>SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)</b>	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA
<b>SECTION D - SELF-MONITORING</b>	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>No</u> ). DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
b) PROPER PRESERVATION TECHNIQUES USED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
<b>SECTION E - FLOW MEASUREMENT</b>	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>No</u> ) DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION <u>July 13, 2009</u> ) The Ultrasonic flow meter is checked daily against Staff Gauge RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
6. HEAD MEASURED AT PROPER LOCATION.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<b>SECTION F – LABORATORY</b>	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>Yes</u> ) DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA

Los Alamos County White Rock						PERMIT NO. NM0020133	
SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
4. QUALITY CONTROL PROCEDURES ADEQUATE.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
5. DUPLICATE SAMPLES ARE ANALYZED. <u>10</u> % OF THE TIME.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
6. SPIKED SAMPLES ARE ANALYZED. <u>  </u> % OF THE TIME. The Los Alamos Cnty Lab participates in the DMR QA study w/ spiked samples 1/year						<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA	
7. COMMERCIAL LABORATORY USED.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
LAB NAME		Hall Environmental			Bio Aquatics		
LAB ADDRESS		4901 Hawkins, NE, Albuquerque, NM 87109			2501 Mayers Road, Suite 100, Carlton, TX 75006		
PARAMETERS PERFORMED		BOD, TSS, E. coli			Whole Effluent Toxicity		
SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>No</u> ).							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No	No	Yes	No	No	Greenish-yellow	
RECEIVING WATER OBSERVATIONS							
SECTION H - SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. DETAILS:				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>Yes</u> ).			
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA			
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA			
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO:				(e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)			
SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED <u>No</u> ).							
1. SAMPLES OBTAINED THIS INSPECTION.						<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA	
2. TYPE OF SAMPLE OBTAINED							
GRAB _____		COMPOSITE SAMPLE <u>  </u>		METHOD _____		FREQUENCY _____	
3. SAMPLES PRESERVED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
4. FLOW PROPORTIONED SAMPLES OBTAINED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
7. SAMPLE SPLIT WITH PERMITTEE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	

Town of White Rock WWTP  
NPDES Permit Number NM0020133 Compliance Evaluation Inspection  
State of New Mexico Surface Water Quality Bureau  
July 15, 2010

## **INTRODUCTION**

A Compliance Evaluation Inspection (CEI) was conducted at the Los Alamos County White Rock Wastewater Treatment Plant (WWTP) by Ms. Barbara Cooney of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) on July 15, 2010. The inspection was conducted by NMED for the U. S. Environmental Protection Agency (USEPA), Region 6, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted under agreement with USEPA and are used by the USEPA to determine compliance with the NPDES permit program.

This facility is a minor municipal waste water treatment plant (WWTP) under the Federal Clean Water Act (CWA), section 402 National Pollutant Discharge Elimination system (NPDES) permit program, and is assigned NPDES permit number NM0020133. The Standard Industrial Classification Code (SIC) is 4952. The facility discharges to the ephemeral Canada del Buey in water quality segment 20.6.4.97 then approximately 1.5 miles down stream to water quality segment 20.6.4.114 of the Rio Grande Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). The designated uses for the segment 20.6.4.97 are livestock watering, wildlife habitat, limited aquatic life and secondary contact. The designated uses for the segment 20.6.4.114 are irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, primary contact and warmwater aquatic life.

## **INSPECTION DETAILS**

The inspector arrived at the White Rock WWTP at 11:30 a.m. on July 15, 2010. She met with Mr. Jeff Ayers, Water-Wastewater Superintendent, Mr. Santiago Martinez, Operations Supervisor, and Mr. Paul Lucero, Plant Operator. The Inspector made introductions, showed her credentials and explained the purpose of the visit. Mr. Ayers and Mr. Martinez accompanied Ms. Cooney as she toured the WWTP. The Inspector was provided, at her request, all records of plant and laboratory activity for the month of March 2010 for a records review. An exit interview was held with Mr. Ayers, Mr. Martinez, and Mr. Lucero following the inspection. Los Alamos County Environmental Compliance Specialist, Mr. Pete Padilla and Utility Manager, Mr. John Arrowsmith were unavailable on the day of the inspection. The Inspector left the White Rock WWTP at 14:30 p.m.

The main area of concern is: "Operation and Maintenance" See the Further Explanations section of the report for details.

## **TREATMENT SCHEME**

The collection system has eight lift stations that transport domestic sewage from residential neighborhoods to the WWTP. The raw sewage enters the WWTP through the Parshall Flume at the head works where a screw pump removes large solids. Those solids are collected in a dumpster then disposed of at the county landfill followed by the grit settling channel, and is removed via screw pump, collected in a dumpster and disposed of in a landfill. Following the grit chamber, is a comminutor grinder to remove large solids and rags. The wastewater can flow from the head works to parallel treatment trains of primary clarifiers to trickling filters, to secondary clarifiers. At the time of this inspection all the flow was being sent to a single

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clarifier. The second train of primary and secondary clarifiers was off line. All the flow was being routed through one primary clarifier, and the two trickling filters were being run in series not parallel. The flow from the second trickling filter goes to a single secondary clarifier. Past the secondary clarifier, a portion of the water is re-circulated back to the end of the head works to insure continuous flow to maintain the zoogaea growth on the trickling filters media. The remaining treated water flows to the chlorine contact chamber for disinfection. That treatment process is followed by dechlorination with SO<sub>2</sub> before the water passes through final flow measurement devices and is discharge to the Canada Del Buey, The reuse water is drawn off before dechlorination and before the effluent flow meter.

### **SLUDGE**

Solids are wasted from the primary and the secondary clarifier/s to an aerobic digester. Re-circulated water and solid are sent back to a splitter box following the grit chamber at the headworks. The decant from the digester, and under drains from the sludge drying beds are also sent to the splitter box, where it mixes with the influent. From the digester, solids are sent to the sludge drying beds. Final disposal of solids are to a composting site at the Los Alamos County Landfill and soon to be a composting site at the Los Alamos Bayo site.

### **FURTHER EXPLANATIONS**

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

**Section A – Permit Verification – Overall Rating of “Satisfactory”**

**Section B – Record Keeping and Reporting – Overall Rating of “Satisfactory”**

**Section C - Operation and Maintenance – Overall Rating of “Marginal”**

### **Permit Requirements For Operation and Maintenance**

The permit requires in Part III.3. PROPER OPERATIONS AND MAINTENANCE:

*a. The permittee shall properly and maintain all facilities and systems of treatment and control (and appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operations and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

### **Findings For Operation and Maintenance:**

1. According to Mr. Ayers, there are not enough operational staff to cover laboratory sampling and analysis on weekends. During the work week, the parks department must discontinue reuse of the treated wastewater, to allow a continuous flow of effluent to discharge to the Canada Del Buey, in order for the facility to collect it's 24 hour composite sampling. If enough operational staff were available at the treatment plant on

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weekends, the parks department could take reuse water as needed and the sampling/laboratory analysis could be done on weekends.

2. The trickling filters are currently being run in series instead of in parallel. The zoogaea slime growth was spotty and not consistent, with patches of bare media in the first trickling filter and with even less cover in the second trickling filter. The media had an estimated 75% cover of growth in the second filter.
3. This treatment plant is nearly 30 years old. The three return flow pumps that send RAS back to the head of the plant are very worn, and are run continuously with out resting. They are leaking oil. The concrete throughout the plant is showing age, with cracks and raveling throughout. Vegetation/weeds were noted to be growing in cracks along the chlorine contact chamber, suggesting that water is leaking out of the unit.
4. There is no alarm system at the treatment plant or at the headworks. Past the headworks the plant is gravity flow. However if there were any overnight failures at the plant, no alarm is available.
5. Improvements have been made in the collections system lift stations. The lift stations in the past had been problematic with unauthorized overflow pipes discharging between residential houses and over the edge of the mesa where White Rock is located. These overflow pipes have been removed. In addition, the alarm system for the lift stations has been upgraded from simple flashing lights, to a SCADA system that phones central dispatch so operators can respond more quickly to any problems.
6. Solids handling has been stepped up at the treatment plant, since the last inspection. Operators are wasting solids daily. There was no sludge blanket found at secondary clarifiers. The more aggressive solids wasting may be impacting the available food necessary to maintain a healthy zoogaea growth in the trickling filters. Plant Operators stated however, that aggressive solids wasting and running the trickling filters in series rather than in parallel improves overall plant operation and the quality of the effluent. It is noted that no effluent exceedences have been reported on the DMRs since the last inspection.

**Section D – Self Monitoring – Overall Rating of “Satisfactory”**

**Section E – Flow Measurements – Overall Rating of “Satisfactory”**

**Section F - Laboratory - Overall Rating of "Satisfactory"**

**Findings For Laboratory:**

The pH buffers being used at the outfall and according to Mr. Ayers were only used for operational control readings and not for effluent NPDES reporting, were in bottles with expired expiration dates. Mr. Ayers said the bottles were just being refilled with fresh buffers. If this is the case, the correct information should be hand written on the bottles.

**Section G - Effluent and Receiving Water - Overall Rating "Satisfactory"**

**Section H - Sludge Disposal - Overall Rating of "Satisfactory"**